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June 17, 2004

Sharla Dillon, Docket Manager
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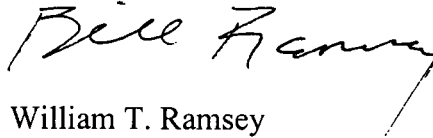
Re: Coalition of Small Lec's
Docket Nos. 03-00585 and 00-00523

Dear Ms. Dillon.

Enclosed is an original and fourteen copies of the Rural Independent Coalition's Supplemental Discovery Requests For Admission Submitted To CMRS Providers.

Thank you for your assistance.

Sincerely,


William T. Ramsey

/jm
enclosures

cc: All Counsel of Record

BEFORE THE

Petition of Celco Partnership d/b/a Verizon Wireless for Arbitration under the Telecommunications Act

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)
)

SUPPLEMENTAL DISCOVERY

on behalf of

Ardmore Telephone Company, Inc.

Ben Lomand Rural Telephone Cooperative, Inc.

Bledsoe Telephone Cooperative

CenturyTel of Adamsville, Inc.

CenturyTel of Claiborne, Inc.

CenturyTel of Ooltewah-Collegedale, Inc.

Concord Telephone Exchange, Inc.

Crockett Telephone Company, Inc.

Dekalb Telephone Cooperative, Inc.

Highland Telephone Cooperative, Inc.

Humphreys County Telephone Company

Loretto Telephone Company, Inc.

Millington Telephone Company

North Central Telephone Cooperative, Inc.

Peoples Telephone Company

Tellico Telephone Company, Inc.

Tennessee Telephone Company

Twin Lakes Telephone Cooperative Corporation

United Telephone Company

West Tennessee Telephone Company, Inc.

Yorkville Telephone Cooperative

"The Coalition of Small LECs and Cooperatives"

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

**Petition of Celco Partnership d/b/a Verizon Wireless)
for Arbitration under the Telecommunications Act)** **Docket No. 03-00585**

**SUPPLEMENTAL DISCOVERY REQUESTS FOR ADMISSION
SUBMITTED TO CMRS PROVIDERS
BY THE RURAL INDEPENDENT COALITION**

The Rural Independent Coalition (hereafter referred to as the "Coalition" or the "Independents") submits the following supplemental requests for admission to the Petitioners in the above-referenced proceeding (hereafter referred to as the "CMRS Providers" and/or "Petitioner" or "Petitioners") to be answered in accordance with the schedule set forth by the Pre-Hearing Officer.

DEFINITIONS

The Coalition incorporates by reference, as if set forth fully herein, the Definitions contained in the Coalition's initial "Interrogatories and Requests for Production of Documents and Things Submitted to CMRS Providers by the Rural Independent Coalition" served on March 19, 2004 on each Petitioner.

INSTRUCTIONS

Each Request for Admission is addressed to the personal knowledge of each Petitioner, as well as to the knowledge and information of each Petitioner's attorneys, investigators, agents, employees, and other representatives.

The singular form of a noun or pronoun shall be construed to include within its meaning the plural form, and vice versa. The terms "and," "or," "each," "every," "any," and "all" as used herein are terms of inclusion and not exclusion, and shall be construed conjunctively or

disjunctively as necessary to bring within the scope of each request for admission any document or response that might otherwise be construed outside of the scope of the request

Each of the Requests for Admission shall be admitted or denied in whole or in part. If a portion of a Request for Admission may be admitted, but not the balance of the Request for Admission, you should admit so much as is true, and deny only the balance. To the extent that any Request for Admission is denied, provide an explanation of the facts upon which the denial is based, and identify the individual responsible for the denial of the Request for Admission.

These Requests for Admission shall be deemed to be continuing, and you are requested to supplement your responses with any information or documents that become available to you at any time up to the conclusion of the proceedings herein.

REQUESTS FOR ADMISSION

The Coalition requests that each Petitioner admit or deny the following matters:

Request No. 1

Admit that each member of the Coalition provides the Petitioner with indirect interconnection permits the Petitioner to terminate traffic to the Coalition member on an indirect basis and in a manner consistent with all established statutory and regulatory requirements.

RESPONSE:

Request No. 2

Admit that, in the context of this proceeding, the FCC's reciprocal compensation rules (47 CFR Sec 51.701 *et seq.*) apply only upon a request from the Petitioner to a Coalition member to establish an interconnection point between the two carriers (i.e., the Petitioner and the Coalition member) in order for the Petitioner to obtain transport of its traffic to the Coalition Member's end office switch that directly serves the called party.

RESPONSE:

Request No. 3

Please consider the following factual scenario: an intraMTA call (i.e., a call originated and terminated within the same MTA) is originated by a landline customer, carried by an interexchange service provider (i.e., not by the landline customer's LEC) and terminated on the Petitioner's CMRS network. Admit 1) that under this factual scenario, the Petitioner's agreements with BellSouth do not require BellSouth to pay Petitioner reciprocal compensation; and 2) that the Petitioner proposes in this proceeding to require the Coalition members to provide reciprocal compensation under this factual scenario.

RESPONSE:

Request 4:

Admit that the Petitioner previously established indirect interconnection to terminate traffic on the network of each Coalition member pursuant to a bilateral agreement executed with BellSouth.

RESPONSE:

Request 5:

Admit that, pursuant to prior effective 2-party agreements with BellSouth, Petitioner compensated BellSouth for the termination of traffic on the networks of Coalition members, and understood that BellSouth provided compensation for the termination of this traffic to Coalition members.

RESPONSE:

Request 6:

Admit that Petitioner's obligation to compensate BellSouth for the termination of traffic on the networks of Coalition members was modified by the execution of a 2-party agreement with BellSouth which established terms and conditions that the Petitioner refers to as a "meet-point billing" arrangement or agreement.

RESPONSE:

Request 7:

Admit that with respect to the “meet-point billing” arrangement or agreement in Request 6, above, the Petitioner claims that this “meet-point billing” arrangement or agreement is consistent with established industry guidelines.

RESPONSE:

Request 8:

Admit that the Petitioner established the “meet-point billing” arrangement or agreement in Request 6, above, in the absence of any agreement or negotiation with any Coalition member.

RESPONSE:

Request 9:

Admit that Petitioner is not aware of any statutory or regulatory standard or requirement that would subject any Coalition member to responsibility for the transport of any traffic beyond the network border of each respective Coalition member.

RESPONSE:

Request 10:

Admit that Petitioner is not aware of any statutory or regulatory standard or requirement that would direct how a LEC chooses to transmit a call to the network of a CMRS provider.

RESPONSE:

Request 11:

Admit that Petitioner is not aware of any statutory or regulatory standard or requirement that would direct how a LEC charges a customer for a call to the network of a CMRS provider.

RESPONSE:

Request 12:

Admit that, with respect to a call between the end user of a landline carrier and an end user of a CMRS provider, the NPA-NXX of the CMRS customer cannot be used to determine whether the call originates and terminates within the local calling scope of the landline carrier or within the same MTA.

RESPONSE:

Respectfully submitted,

NEAL & HARWELL, PLC

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William T. Ramsey

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Counsel for The Tennessee Rural Independent Coalition

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the foregoing has been served on the parties of record indicated below via U.S. Mail and via electronic mail on this the ____ day of June, 2004.

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Certificate of Service, Page 2

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